

EXHIBIT A

Nolan Roberts

May 14, 2016

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4
5 _____
6 ROBERT WEINTRAUB, et al,

7 Plaintiffs,

8 VS.

NO. 1:15-cv-01213AT

9
10 ADVANCED CORRECTIONAL
11 HEALTHCARE, et al,

12 Defendants.
13 _____

14 DEPOSITION

15 OF

16 NOLAN ROBERTS

17 Saturday May 14th, 2016
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21
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25

1 military, too.

2 Q. Yeah? Excellent. What time did --
3 when did you start working for PTS?

4 A. I want to say March of 14.

5 Q. Okay. How long were you there for?

6 A. Just a couple of -- two to three
7 months.

8 Q. Okay. So at the time of this incident
9 you hadn't really been there all terribly long,
10 either?

11 A. No, ma'am.

12 Q. More than Mr. Davis? So you weren't
13 still this training like he was?

14 A. No, ma'am, I was not.

15 Q. Okay. Excellent. PTS of America, as
16 far as you know, it is a company that transports
17 people across the country.

18 A. Yes, ma'am.

19 Q. Specifically prisoners, detainees, that
20 sort of thing?

21 A. Yes ma'am.

22 Q. It is a priority for them to do so
23 safely?

24 A. Yes, ma'am.

25 Q. Okay. We'll go ahead and do -- I'm

1 right.

2 BY MS. BASKAM:

3 Q. So would you agree that that is what
4 PTS -- something that PTS cares about?

5 A. Yes, ma'am.

6 Q. And so what was your job at PTS?

7 A. I was a driver and, slash, agent, I
8 guess, that encompasses driving, make sure the
9 people it that we're carrying are fed, they stay
10 relatively safe -- I'm not going to say
11 "relatively safe," they stay safe. If they
12 request medical attention, do what we can to get
13 them medical attention. Sign them in and out of
14 either the prison or jail system they are coming
15 to us from or going into.

16 Q. Okay. Tell me a little bit about your
17 background. I believe I saw you were a
18 corrections officer before you started working
19 at PTS.

20 A. Yes. How far do you want me to go
21 back?

22 Q. I guess just tell me a little bit about
23 that.

24 A. I started working for the Weakley
25 County Jail May of 2011, and I worked there

1 MS. BASKAM: That's fine. It is still
2 all included within the operations manual based
3 on Page 41, which includes addendums and
4 samples.

5 MR.PARTIN: Let's go off the record for
6 a second.

7 THE VIDEOGRAPHER: Going off the
8 record. The time is 1:54.

9 (Off-the-record discussion.)

10 THE VIDEOGRAPHER: Going back on the
11 record. The time is 1:55.

12 BY MS. BASKAM:

13 Q. Giving back to you what was marked as
14 Plaintiff's Exhibit 2 to Mark Davis's
15 deposition, does that look familiar to you?

16 A. Yes.

17 Q. Is that the policies manual? Were you
18 given this during training?

19 A. Yes, ma'am.

20 Q. Okay. What did that involve in
21 training?

22 A. My training went pretty quick. They
23 needed agents to get on the road pretty quick.
24 So we just went through this, hit the high
25 points and then --

1 Q. Was there any kind of request for you
2 to review it on your own?

3 A. They said we could. It wasn't
4 mandatory.

5 Q. So they just went through highlights of
6 it, and that was the extent that you looked at
7 it?

8 A. Yes, ma'am.

9 Q. Okay. We'll go ahead and go through
10 some things. You can let me know if you knew
11 about those, if you understood that to be policy
12 that you followed while you were working at PTS.

13 A. Okay.

14 Q. First, on the second page you'll see
15 that there is this little signatory page that
16 says you are responsible for reading. Did you
17 see a page like that? Did they point anything
18 like that out to you?

19 A. To be completely honest with you, I
20 really can't remember.

21 Q. That's fine. So then moving on, I just
22 want to talk generally about the documentation
23 that you had to have before you got to a
24 prisoner or a detainee to pick up. Before you
25 ever got to the jail or to wherever you were

1 picking them up, you already had documents about
2 those prisoners. Is that correct?

3 A. Sometimes. We would be given a -- like
4 a face sheet type deal.

5 Q. That would come from PTS directly?

6 A. Uh-huh. It had the information from
7 the place we were picking up, the place we were
8 dropping off and just the offender's name and
9 some brief information about him, height,
10 weight, stuff like that.

11 Q. Were you supposed to review that before
12 or at any point?

13 A. We would look -- I took it and I would
14 look over them briefly.

15 Q. Was that just something you chose to
16 do?

17 A. Most of the time that packet right
18 there, I would fill out those packets for the
19 people that we were picking up.

20 Q. So if you are looking at Page 7 --

21 MR. DALY: Of the document or the Bates
22 numbered pages?

23 MS. BASKAM: I'm sorry. You are right.
24 The Bates number page. Let's go to Page 3.
25 Thank you.

1 BY MS. BASKAM:

2 Q. You have seen the activity log, that's
3 one of the things you had to have?

4 A. I don't see it on here. You said this
5 page?

6 MR. DALY: (Indicating.)

7 A. Okay. Yeah.

8 BY MS. BASKAM:

9 Q. Down under the third --

10 A. Yeah. Yes, ma'am.

11 Q. You have the activity log. That would
12 have all this information about who is in
13 charge, the van, that kind of thing?

14 A. Yes, ma'am.

15 Q. Then would you have the prisoner
16 packet?

17 A. Yes, ma'am.

18 Q. You would know if the prisoner received
19 legal forms, a prisoner status report?

20 A. Yes, ma'am.

21 Q. The prisoner status report had medical
22 information in it?

23 A. To my knowledge, it did.

24 Q. And so what -- was it part of the
25 policy for you to look at that before you got to

1 the inmates to check if there is any medical
2 condition, any concerns?

3 A. I'm not sure if it was part of policy,
4 but I would try to look at that just to kind of
5 see what we were going to be getting into.

6 Q. Okay. Okay. If you would turn to Page
7 14. You understood that it was your
8 responsibility to pay attention to things such
9 as prisoner mood or attitude changes?

10 A. Yes, ma'am.

11 Q. Was there a first-aid kit on the van?

12 A. I can't remember if there was or there
13 wasn't.

14 Q. Would you remember knowing where a
15 first-aid kit would be on the van if there was
16 one? Would it be in a typical place?

17 A. Depending on the OIC of the trip. I
18 road with three different OIC's for the time I
19 was at PTS, and each OIC kept different stuff in
20 different places.

21 Q. So for Arnold?

22 A. I couldn't tell you.

23 Q. Okay. How about Page 16, you
24 understood that whoever was driving had to be
25 conscious of their responsibility to the

1 passenger and the prisoners?

2 A. Yes, ma'am.

3 Q. Okay. Then Page 22, you understood
4 that all prisoners had to be restrained with
5 handcuffs and leg irons and interconnects,
6 right?

7 A. And belly chains.

8 Q. And so have you personally chained up
9 an inmate, a detainee, before? That is
10 something you have done, shackled them before?

11 A. Yes, ma'am.

12 Q. Tell me a little bit about that.
13 That's a pretty failproof system, right?

14 A. Not necessarily.

15 Q. Okay.

16 A. You would put the -- most of the times
17 I like to put the shackles on first, and then
18 I'll have the offender, whoever I'm cuffing or
19 shackling, face the wall, wrap the belly chain
20 around them and then go ahead and put the cuffs
21 in and then have them slide -- put their wrists
22 in the cuffs and cuff them down.

23 Q. So at that point they are pretty
24 limited in what they can do, their range of
25 movement?

1 A. Yes, ma'am.

2 Q. I want to talk about from Page 26,
3 there is this whole section on special-needs
4 prisoners. Have you heard that term before?

5 A. Yes, ma'am.

6 Q. Did you receive training about special-
7 needs prisoners?

8 A. If I did, it was brief.

9 Q. If you did, it was brief. Okay. In
10 this, it says "policy," "PTS shall provide the
11 best possible special care that corresponds to
12 the physical problem or physical or mental
13 impairment of the prisoner." Does that sound
14 correct to you?

15 A. Yes, ma'am.

16 Q. So if you get a place and you realize
17 that a prisoner has a special need, then you
18 might do something different for them? They
19 might have different needs for transport?

20 A. Depending, yes, ma'am.

21 Q. So let's go through some of those, what
22 could be special needs to talk about, so that we
23 can talk about it further. Say if they have,
24 the next page, HIV AIDS or they are a diabetic
25 or they have a broken limb or they've got a

1 nervous disorder, psychosis or they've got
2 medications, do you agree that those are special
3 needs?

4 A. Yes, ma'am.

5 Q. Then you also understood that the
6 policy was that in the event that a prisoner
7 develops a medical condition that is life-
8 threatening, that they can be transported to an
9 emergency room immediately; right?

10 A. Yes, ma'am.

11 Q. And did you also understand that policy
12 allowed for you to call back to PTS, call to
13 whoever your supervisor was to check about
14 something?

15 A. Yes, ma'am.

16 Q. To check what to do in a situation?

17 A. Yes, ma'am.

18 Q. So turning to Page 28, you understood
19 policy -- the policy that an inmate must be
20 taken to a hospital if a request is made for
21 medical care. Is that correct?

22 A. Yes, ma'am.

23 Q. There is also under the PTS policies
24 you could -- you must contact dispatch and
25 advise of the condition, right?

1 A. Yes, ma'am.

2 Q. And you also must contact the client
3 and get approval for the visit to the hospital?

4 A. Yes, ma'am.

5 Q. Okay. How about Letter H right there,
6 if the agent arrives at pick-up and discovers
7 that a special-needs prisoner is to be
8 transported, the agent should contact
9 headquarters for instructions, did you know that
10 that was --

11 A. Yes, ma'am.

12 Q. -- the case? Did that ever happen for
13 you that you reached a place and saw you thought
14 that they had special needs and you called back
15 to figure out what to do?

16 A. Yes, ma'am, with the approval of the
17 agent-in-charge.

18 Q. Got it. Thank you. All right. Then
19 Page 36, which is standards of conduct, the
20 employee of PTS shall refrain from participating
21 in any criminal, dishonest, infamous, immoral or
22 disgraceful conduct or activity. Is that how
23 you understood the policy to be?

24 A. Yes, ma'am.

25 Q. Did you receive any training on CPR?

1 RESPECTIVELY.)

2 BY MS. BASKAM:

3 Q. Do those look familiar to you,
4 Mr. Roberts?

5 A. Vaguely, yes.

6 Q. This is a PowerPoint that we received
7 from PTS. It is not the complete PowerPoint.
8 It is just a few slides pulled from it. But I
9 just wanted to call your attention to -- can you
10 go to the second or the third page, if we're
11 counting the first page, where the title says
12 "Civil and Criminal liabilities."

13 A. Uh-huh.

14 Q. Were these all things that you were
15 taught in training, prisoners have the right to
16 be free from harassment and discrimination?

17 A. Yes, ma'am.

18 Q. Prisoners have the right not to receive
19 cruel and unusual punishment?

20 A. Yes ma'am.

21 Q. Prisoners have the right to receive
22 medical care?

23 A. Yes, ma'am.

24 Q. Prisoners have the right to be
25 transported in a safe, secure and humane manner?

1 A. Yes, ma'am.

2 Q. It is important for PTS agents to know
3 and understand all the policies and procedures
4 and to know and understand and protect the
5 rights of prisoners?

6 A. Yes, ma'am.

7 Q. If we can turn to the next page. What
8 I'm seeing are some steps. Are these the steps
9 that you understood to be the steps that you
10 should take when you are picking up a prisoner?

11 A. Yes, ma'am.

12 Q. Okay. Including to check medical
13 clearance?

14 A. Yes, ma'am.

15 Q. And identify any personality and
16 behavioral traits or problems?

17 A. Yes, ma'am.

18 Q. To check both the mental and physical
19 condition of the prisoner?

20 A. Yes, ma'am.

21 Q. You are to do this every time you pick
22 someone up?

23 A. Yes, ma'am.

24 Q. Okay. Then this last page, always
25 interview the prisoner in private and do not --

1 A. Depending on his answer, his or her
2 answer, is where it would go from there.

3 Q. How about if they were unnaturally
4 pale? Would that concern you?

5 MR. DALY: Object to the form.

6 A. Same answer. It is all hypotheticals.
7 Then again, I would ask them if they were okay.
8 Depending on their answer --

9 BY MS. BASKAM:

10 Q. But it would spur you to ask if they
11 were okay?

12 A. Yes, ma'am.

13 MR. DALY: Object to the form.

14 BY MS. BASKAM:

15 Q. In your incident report and in your
16 statements to the GBI you said that medical
17 cleared Mr. Weintraub for travel. Do you
18 remember anything about that?

19 A. I remember him saying something about
20 him hurting in his stomach area, and Arnold,
21 which was the OIC on the trip, asked, you know,
22 for medical at Owensboro to check him out. And
23 they cleared him.

24 Q. Who is "they"?

25 A. The medical staff there.

1 but you don't remember whether they were a woman
2 or a man, correct?

3 A. Correct.

4 Q. And you don't remember what was said
5 between this person and Mr. Arnold, correct?

6 A. Not everything, no.

7 Q. What do you remember that was said?

8 A. Just that Arnold told me that he was
9 cleared and that he was faking and that he --
10 all he wanted was Pepto. That's what I
11 remember. That's what stuck in my head.

12 Q. Do you remember whether Arnold or this
13 person said anything about what their job was?

14 A. No, not that I can remember.

15 Q. Nothing was said about if they were a
16 nurse or a doctor?

17 A. No, ma'am.

18 Q. Was Pepto given to Dr. Weintraub?

19 A. Yet again, I don't know.

20 Q. You did not give Pepto to
21 Dr. Weintraub?

22 A. No, I did not.

23 Q. You did not do anything -- did you not
24 provide any aid to Dr. Weintraub?

25 A. I didn't give him any medication or

1 anything like that.

2 Q. Or speak it a doctor?

3 A. Personally, no, I did not.

4 Q. Okay. Or you did not call the field --
5 the trip manager or anyone from PTS concerning
6 Dr. Weintraub?

7 A. It wasn't my place to.

8 Q. Your place would be to speak with
9 officer-in-charge?

10 A. Correct.

11 Q. And you did not bring anything to the
12 attention of the officer-in-charge?

13 A. He already knew about it.

14 Q. But you didn't point anything out to
15 him?

16 A. Not that I can remember, no, ma'am.

17 Q. Okay. Do you remember Dr. Weintraub
18 being loaded into the van?

19 A. No, ma'am.

20 Q. Okay. But you did not load him into
21 the van?

22 A. Not that I can recall.

23 Q. Do you remember what you were doing
24 when the inmates were loaded into the van?

25 A. From what I can remember, I was doing

1 one of two things: Either helping the females
2 into the van on the side of the van or getting
3 ready. Because I was the first one to drive, I
4 would have been either doing that or getting
5 ready -- getting an address put into a GPS and
6 doing that.

7 Q. Okay. During this time of Mr. --
8 Dr. Weintraub being loaded into the van or when
9 you first started your journey, do you remember
10 hearing Dr. Weintraub moaning and groaning?

11 A. While we were in the van?

12 Q. Yes.

13 A. No, ma'am.

14 Q. Do you remember him groaning while he
15 was being loaded or before he was loaded into
16 the van?

17 A. Very vaguely.

18 Q. Do you remember mocking him with
19 groaning sounds?

20 A. Unfortunately, yes, ma'am, I do.

21 Q. You did this before you got in the van?

22 A. A little bit before and a little bit
23 after, yes, ma'am.

24 Q. So he was mocked multiple times by you?

25 A. By not just me. All three of us. Yes,

1 ma'am.

2 Q. And during this time while you were
3 mocking his groaning, it never occurred to
4 you -- or did it occur to you to check if
5 something was really wrong?

6 A. At that time we were taking the word of
7 what we were told at Owensboro, which was that
8 there was nothing wrong with him and it was
9 basically a case of jaillitis and all he wanted
10 was Pepto. In my head that's what I was going
11 off of.

12 Q. Can you fake sweating?

13 A. I don't see how.

14 Q. Can you fake becoming pale?

15 A. I don't see how.

16 Q. And could you fake becoming
17 jaundiced-colored, yellow in the face?

18 A. Again, same answer. I don't see how.

19 Q. And if the inmates that were in the van
20 with Dr. Weintraub described him as looking as
21 all of these things, would you dispute that?
22 Would you a disagree with that opinion or
23 description?

24 A. Sitting here today, I couldn't agree or
25 disagree with it because I don't exactly

1 remember what he looked like then.

2 Q. But if you saw those things -- well,
3 I'll -- you said in an interview with the GBI
4 that Dr. Weintraub was obviously in distress. I
5 understand you don't remember any more what he
6 looked like at that time. But if you said that
7 to the GBI, would you imagine that that was
8 correct, that that was your impression of him?

9 A. If I said it, I --

10 Q. If he was obviously in distress, based
11 on the policies that you know for someone with
12 special needs, should you have or should someone
13 from PTS have called either a doctor or maybe
14 your trip manager?

15 A. Again, we were going off of what we
16 were told at Owensboro. If -- again, this is
17 hypotheticals. If he would have said something to
18 us, we would have taken the steps that we needed
19 to take.

20 As far as an organization, okay, if he
21 would have said -- say when we stopped for goes
22 right outside of Owensboro or in Owensboro, if
23 he would have said, hey, I'm really hurting, I
24 would have let Arnold know, and I would have let
25 Arnold make that call of what to do.

1 Q. At least one, if not several, of the
2 inmates said that he did have to use the
3 restroom around Chattanooga. Do you remember
4 that?

5 A. No, ma'am.

6 Q. I believe another inmate asked -- or
7 said that they remembered him asking for
8 medication for his stomach, including, like you
9 said, Pepto or Malox. Do you remember that?

10 A. No, ma'am.

11 Q. But you do remember, as you said
12 before, that he asked for Pepto?

13 A. While we were at the jail, yes.

14 Q. But you don't remember if he ever got
15 it?

16 A. No, ma'am, I do not.

17 Q. So you get in the van at Daviess
18 County. Then what happens?

19 A. After we got everybody loaded up, we
20 stopped at the -- one of the gas stations and
21 filled up. Then we hit the road going towards
22 Blairsville.

23 Q. When you stopped to get gas, you didn't
24 check on the inmates or detainees or let them
25 out, did you?

1 water for the inmates. Is that correct?

2 A. Yes, ma'am. We stopped to get water
3 and also change out drivers.

4 Q. During that first leg do you remember
5 Dr. Weintraub asking for the air conditioning to
6 being raised --

7 A. No, ma'am.

8 Q. -- or him asking for water?

9 A. No, ma'am.

10 Q. Then you got to Chattanooga and you got
11 water. At this point you don't take the inmates
12 out to use the restroom, correct?

13 A. No, ma'am.

14 Q. And so during the entirety of this trip
15 until you got to Union County you don't take the
16 inmates out to use the restroom at all, correct?

17 A. I know until we got to Chattanooga we
18 didn't. After we left Chattanooga, I was asleep
19 within five, ten minutes of leaving Chattanooga.
20 Then I didn't wake up until we were at -- in
21 Blairsville, Georgia, and I got woke up to the
22 door coming open and getting hit on the leg and
23 me getting told, hey, you need to get out here.

24 Q. That was Arnold telling you that?

25 A. No, that was Mark.

1 Q. At that point they realized
2 Dr. Weintraub was dead or unresponsive?

3 A. Yes, ma'am.

4 Q. Do you remember at any point before
5 that hearing the inmates ask about help for
6 Dr. Weintraub?

7 A. No, ma'am. I was asleep.

8 Q. One of the -- multiple inmates,
9 actually, testified that when Arnold went to
10 take the women into the Union County to use the
11 restroom first, that they were trying to get
12 care for Dr. Weintraub, and that one of the PTS
13 agents said you have to wait until the boss gets
14 here. Do you remember that?

15 A. No, ma'am.

16 MR. DALY: Object to the form.

17 MR. SPAINHOUR: Objection.

18 BY MS. BASKAM:

19 Q. So that was not you who said that?

20 MR. DALY: Same objection.

21 A. I was asleep at that point. The first
22 thing I remember from leaving Chattanooga and
23 going to sleep is being woke up to, hey, you
24 needs to get back here and help. That's it.

25 BY MS. BASKAM:

1 County and gets out of the van and starts taking
2 these women inside, is it normal that he would
3 not wake you up before doing that?

4 A. Being at a jail, yes, that is normal.

5 Q. So would you just still be sleeping in
6 this van not aware of what is happening?

7 A. Correct. You are in a space where you
8 are at a jail, you are in a secured area. So, I
9 mean --

10 MS. BASKAM: Can we go off record a
11 second.

12 THE VIDEOGRAPHER: Going off the
13 record. The time is 2:40.

14 (Brief recess.)

15 THE VIDEOGRAPHER: Going back on the
16 record. The time is 2:41.

17 BY MS. BASKAM:

18 Q. Just a few other questions about the
19 statement you made to the GBI. Do you remember
20 having two conversations with Ken Baker maybe?

21 A. No.

22 Q. Just with the GBI about what happened?

23 A. I had three conversations with them
24 from what I can remember.

25 Q. So in the first one -- but all three

1 A. In the world of corrections and
2 transporting inmates and stuff like that,
3 inmates have rules that the facility's
4 corrections officers have to enforce and follow.
5 Inmates, on the other hand, have their own set
6 of rules, too. I know a lot of times they do
7 govern themselves.

8 Q. I'm going to move to strike this as
9 unresponsive.

10 Did you tell an inmate that they should
11 govern themselves on this trip?

12 A. Yes, ma'am, I did.

13 Q. Do you recall inmates and -- well, do
14 you recall inmates telling Dr. Weintraub to be
15 quiet?

16 A. Vaguely, yes, ma'am.

17 Q. Do you recall PTS agents telling
18 Weintraub to be quiet?

19 A. After we were told, you know, that
20 there is nothing wrong with him, that he was
21 faking it, vaguely I remember somebody saying,
22 you know, we're told -- or there is nothing
23 wrong with you, you know, quit.

24 Q. So did you tell Dr. Weintraub or did a
25 PTS agent tell Dr. Weintraub to be quiet? Yes

1 or no?

2 A. It might have been said. I don't know
3 who said it. I can't remember.

4 Q. Do you know whether it was said
5 regardless of who was the one who said it?

6 A. I can't remember. I'm being honest
7 with you. I can't remember if it was said or
8 not.

9 Q. Okay. When you were mocking
10 Dr. Weintraub, you were making groaning noises?

11 A. Yes, ma'am.

12 Q. And you knew you were doing that at the
13 time that you made those noises?

14 A. I know I was doing that.

15 Q. Yes.

16 A. Yes, ma'am, I do.

17 Q. It wasn't some involuntary reaction?

18 A. No, ma'am. I was well aware of what I
19 was doing.

20 Q. Why did you do it?

21 A. I can't tell you why. I mean, it was a
22 mistake. I knew as to why we were doing it, I
23 mean, but I couldn't give you an exact reason
24 why.

25 Q. At the time when you stopped in

1 Arnold just said he is cleared for transport?

2 That's what you just testified to.

3 A. I said a few minutes ago also that I
4 saw him talking to the medical staff at Daviess
5 County.

6 Q. That's right. You don't have any idea
7 what medical actually told Arnold?

8 A. I guess I don't.

9 Q. But you just assumed that Mr. Weintraub
10 was cleared for transport because that's what
11 you were told by Arnold?

12 A. I guess in your words, yes, sir.

13 Q. Now, you didn't look at any of
14 Mr. Weintraub's medical paperwork, did you?

15 A. Not that I can recall.

16 Q. But medical paperwork is part of the
17 prisoner packet?

18 A. Yes, sir.

19 Q. And part of the prisoner packet would
20 be a medical authorization for transport?

21 A. I would assume so, yes, sir.

22 Q. Have you ever seen a medical packet
23 that included a medical authorization for
24 transport?

25 A. That top paper right there is the only

1 A. As far as I know, no, sir.

2 Q. You know that Mr. Weintraub was housed
3 at Daviess County Jail for awhile, right?

4 A. Yes, sir.

5 Q. And so there wouldn't be a separate
6 medical authorization for transport from Daviess
7 County Jail?

8 A. No, sir.

9 Q. When agent Arnold told you that
10 Mr. Weintraub was cleared for transport, did you
11 say to him, hey, you know, we need to get a
12 medical authorization from Daviess County Jail
13 to clear him?

14 A. It wasn't my place to.

15 Q. Why wasn't it your place?

16 A. Because I wasn't the officer-in-charge.

17 Q. Is it your testimony, then, that only
18 the officer-in-charge has the responsibility for
19 ensuring the medical safety of inmates?

20 A. No, sir.

21 Q. I mean you have some responsibility,
22 right?

23 A. Yes, sir, I do.

24 Q. You didn't say anything to Agent Arnold
25 about getting an authorization, medical

1 authorization, for Mr. Weintraub from Daviess
2 County Jail?

3 A. No, sir, I did not.

4 Q. The PTS policies require you as an
5 agent to get an inmate medical care if you
6 believe they need it?

7 A. Yes, sir.

8 Q. And you didn't make any attempt to get
9 Mr. Weintraub medical care?

10 A. When I guess in your words I was going
11 off of what Arnold told me and, like I said,
12 like I testified to earlier, once we left
13 Daviess County, I didn't hear anything out of
14 Mr. Weintraub.

15 Q. But while at the Daviess County Jail
16 you didn't see anything from Weintraub that told
17 you, hey, we need to get him medical attention?

18 A. I know while we were at Daviess County
19 Agent Arnold asked for the medical staff from
20 Daviess County to come check him out, and they
21 come out there, and as far as they checked him
22 out, what they did to check him out, I'm unsure
23 of that, but I know they did come out there, and
24 I saw them talk to Arnold. I mean, I can't
25 remember if they actually took him back into the

1 jail and gave him a once-over. I can't remember
2 what all they did with Mr. Weintraub per se.
3 But, I mean, I did see they did come out there.

4 Q. So you saw medical come out to the
5 holding area before Mr. Weintraub was
6 transported from Daviess County Detention
7 Center?

8 A. Before we left with him, yes, sir, I
9 did.

10 Q. Did you see Mr. Weintraub disappear
11 into medical after he came out of holding?

12 A. I can't recall.

13 Q. Do you know why Agent Arnold asked for
14 medical to come out and check out Mr. Weintraub?

15 A. Because he had said that he was in
16 pain.

17 Q. Did you and Agent Arnold have a
18 discussion about why Agent Arnold wanted to have
19 medical staff come out and check out
20 Mr. Weintraub?

21 A. Not that I can recall.

22 Q. How do you know that the reason why
23 Agent Arnold wanted medical to come out and
24 check out Mr. Weintraub was because
25 Mr. Weintraub was in pain?

1 person that came out to medical?

2 A. As I stated the last three questions
3 you asked, no, sir, I haven't. No, sir, I
4 cannot.

5 Q. Do you remember what that person was
6 wearing?

7 A. I mean I know they were wearing scrubs.

8 Q. How do you know they were wearing
9 scrubs?

10 A. I mean I can -- I mean -- I mean I can
11 remember that part.

12 Q. You can remember that they were wearing
13 scrubs?

14 A. Yes, sir.

15 Q. You just can't remember anything else
16 about the individual?

17 A. Correct.

18 Q. What color scrubs?

19 A. I can't remember.

20 Q. How do you know the person was wearing
21 scrubs?

22 A. That's just what sticks in my head.

23 Q. Did you see the person who came out --
24 that you believe came out from medical touch
25 Mr. Weintraub in any way.

1 A. No, sir, I did not.

2 Q. Did you see the person that you believe
3 came out from medical give Mr. Weintraub
4 anything?

5 A. No, sir, I did not.

6 Q. Did you see Mr. Weintraub at any time
7 take any medication?

8 A. No, sir, I did not.

9 Q. Did at any time anybody mention giving
10 Mr. Weintraub Tylenol?

11 A. Not that I can remember.

12 Q. Did anybody at any time ever mention
13 Mr. Weintraub having been given Tylenol?

14 A. Not that I can remember.

15 Q. Do you remember any conversations with
16 any of the staff at the Daviess County Jail
17 other than the one correctional officer that you
18 testified to earlier?

19 A. As far as conversation goes, I can't
20 remember what exactly we talked about.

21 Q. Do you remember anybody at Daviess
22 County Detention Center calling Mr. Weintraub a
23 pussy?

24 A. No, sir.

25 Q. Do you remember anybody at Daviess

1 County Jail ever mocking Mr. Weintraub other
2 than you and your fellow agents?

3 A. Not that I can remember.

4 Q. How many times did you pick up
5 prisoners at the Daviess County Detention
6 Center?

7 A. Four, five, six times, if I can
8 remember correct. Four or five, six times,
9 somewhere in there.

10 Q. During those four or five, six times,
11 do you ever remember anybody at Daviess County
12 Detention Center mocking or making fun of
13 inmates?

14 A. Not that I can remember, no, sir.

15 Q. The officer-in-charge would have been
16 responsible for reviewing Mr. Weintraub's inmate
17 package?

18 A. The agent-in-charge for PTS?

19 Q. Yes.

20 A. Yes, sir.

21 Q. And so it would have been Arnold that
22 would have reviewed Mr. Weintraub's prisoner
23 transport package?

24 A. Yes, sir.

25 Q. So it would have been Officer Arnold